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United States Attorney

District of Oregon

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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

UNITED STATES OF AMERICA,

6:22-mc-791

Plaintiff,

v.

\$16,481.00 U.S. CURRENCY, *in rem*,

Defendant.

**UNOPPOSED MOTION TO
EXTEND 90-DAY PERIOD
PURSUANT TO
18 U.S.C. § 983(a)(3)(A)**

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted Joshua Gibbs, attorney for claimant Harvey Caron, who concurs with this extension.

On May 13, 2022, Harvey Caron filed a claim in a non-judicial civil forfeiture proceeding by U.S. Customs and Border Protection to \$16,481.00 U.S. Currency seized from Harvey Caron on or about August 25, 2021.

No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Harvey Caron, agree to extend the time in which the United States will file a complaint for forfeiture against the

\$16,481.00 or to obtain an indictment alleging that the assets are subject to forfeiture. Harvey Caron agrees that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended to Monday, September 12, 2022.

Harvey Caron agrees that until the United States files a complaint for forfeiture against the assets and/or obtains an indictment alleging that the assets are subject to forfeiture, or until September 12, 2022, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States and Harvey Caron shall not seek its return for any reason in any manner.

DATED: August 11, 2022

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ Judith R. Harper
JUDITH R. HARPER
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have made service of the foregoing Motion to Extend 90-Day Period and a proposed Order on the party herein by sending via email on August 11, 2022 to:

Joshua Gibbs
Josh@JoshGibbsLaw.com
Attorney for claimant Harvey Caron

s/ Dawn Susuico
DAWN SUSUICO
Paralegal